

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL, INC., and
HONEYWELL INTELLECTUAL
PROPERTIES, INC.,

Plaintiffs,

v.

C.A. No. 04-1337 (***)

AUDIOVOX COMMUNICATIONS CORP.,
AUDIOVOX ELECTRONICS CORP., NIKON
CORPORATION, NIKON INC., NOKIA
CORPORATION, NOKIA INC., SANYO
ELECTRIC CO., LTD., and SANYO NORTH
AMERICA,

Defendants.

HONEYWELL INTERNATIONAL, INC., and
HONEYWELL INTELLECTUAL
PROPERTIES, INC.,

Plaintiffs,

v.

C.A. No. 04-1338 (***)

APPLE COMPUTER, INC.; ARGUS a/k/a
HARTFORD COMPUTER GROUP, INC.;
CASIO COMPUTER CO., LTD.; CASIO, INC.;
CONCORD CAMERAS; DELL
INC.; EASTMAN KODAK COMPANY; FUJI
PHOTO FILM CO., LTD.; FUJI PHOTO FILM
U.S.A., INC.; FUJITSU LIMITED; FUJITSU
AMERICA, INC.; FUJITSU COMPUTER
PRODUCTS OF AMERICA, INC.; KYOCERA
WIRELESS CORP.; MATSUSHITA
ELECTRICAL INDUSTRIAL CO.;
MATSUSHITA ELECTRICAL
CORPORATION OF AMERICA; NAVMAN
NZ LIMITED; NAVMAN U.S.A. INC.;
OLYMPUS CORPORATION; OLYMPUS
AMERICA, INC.; PENTAX CORPORATION;
PENTAX U.S.A., INC.; SONY
CORPORATION, SONY CORPORATION OF
AMERICA; SONY ERICSSON MOBILE

COMMUNICATIONS AB; SONY ERICSSON
MOBILE COMMUNICATIONS (USA) INC.;
TOSHIBA CORPORATION; and TOSHIBA
AMERICA, INC.

Defendants.

HONEYWELL INTERNATIONAL INC., AND
HONEYWELL INTELLECTUAL
PROPERTIES INC.,

Plaintiff,

vs.

CITIZEN WATCH CO., LTD. AND CITIZEN
DISPLAYS CO., LTD.,

Defendants.

Case No. 1:05 CV 00874 ***

**DECLARATION OF CAROL LU IN SUPPORT OF DEFENDANTS
CITIZEN WATCH CO., LTD. AND CITIZEN DISPLAYS CO., LTD.'S
MOTION FOR SUMMARY JUDGMENT OF NON-INFRINGEMENT**

I, CAROL LU, hereby state as follows:

1. I make this Declaration based on personal knowledge, I am over the age of 18, and I am competent to testify to the matters set forth herein.
2. Prior to April 30, 2007, I was an employee of Citizen Systems (H.K.), Taiwan Branch, which was a group company of Citizen Watch Co., Ltd.
3. On September 14, 2006, I sent an email to Morris Yu at Quanta Computer, requesting that the excess materials for the RA1 module remaining in stock at Citizen's factories be destroyed. The RA1 module is also known as the K1122H-HL module.

4. I spoke to Elaine Yang at Quanta Computer between September 14, 2006 and September 20, 2006, and explained to her that Citizen could not accept any orders for the RA1 modules.

5. On September 20, 2006, I explained again that Citizen could not accept any orders for the RA1 modules.

6. Elaine Yang authorized Citizen to destroy the excess RA1 modules on September 20, 2006.

7. Attached hereto as Exhibit A is a true and correct copy of my email correspondence with Mr. Yu and Ms. Yang, referenced above.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Taipei, Taiwan, this 6th day of November 2007.

Carol Lu
Carol Lu